

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

The Estate of Joseph P. King, by and through its
Administratrix, Amy King, and Amy King in her own right,
Plaintiff,

-against-

NOTICE OF MOTION

9:20-CV-1413
(TJM/ML)

Anthony J. Annucci, Acting Commissioner, State of New
York Department of Corrections, in his individual capacity;
and Marie T. Sullivan, Commissioner, State of New York
Department of Mental Health, in her individual capacity;
Jami Palladino, Mid-State Social Worker, in her individual
capacity; Hal Meyers, Mid-State Chief Mental Health Counselor,
in his individual capacity;

Defendants.

Motion By:

LETITIA JAMES
Attorney General of the State of New York
Attorney for Defendants

By: Aimee Cowan
Assistant Attorney General, of Counsel
Bar Roll No. 516178

Time and Place of Hearing:

_____, at 10:00 a.m. before United
States District Judge Thomas J. McAvoy to
be held at the United States District
Courthouse in Binghamton, New York **upon**
submission only

Relief and Basis:

An Order pursuant to Fed. R. Civ. P. 56(a)
dismissing Plaintiff's Amended Complaint
with prejudice, and for such other and further
relief as the Court deems just and proper.

Supporting Papers:

Statement of Material Facts Not in Dispute,
Declaration of Attorney Cowan, with
attached Exhibits "A" through "Q,"
Declaration of Defendants Annucci,
Sullivan, Meyers and Palladino, and
Defendants' Memorandum of Law.

Dated: Syracuse, New York
January 12, 2023

LETITIA JAMES
Attorney General of the State of New York
Attorney for Defendants
300 S. State Street, Ste. 300
Syracuse, New York 13202

By: s/ Aimee Cowan

Aimee Cowan
Assistant Attorney General, of Counsel
Bar Roll No. 516178
Telephone: (315) 448-4800
Fax: (315) 448-4853
Email: aimee.cowan@ag.ny.gov

To: Yamile Kalkach Campos, Esq.
Hillary Nappi, Esq.
Hach Rose Schirripa & Cheverie, LLP
112 Madison Avenue
New York, NY 10016